

<i>SERFF Tracking Number:</i>	<i>AGNN-126111628</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>The Variable Annuity Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>42102</i>
<i>Company Tracking Number:</i>	<i>FLEX5-805-X-SP</i>		
<i>TOI:</i>	<i>A02.11 Individual Annuities- Deferred Non- Variable and Variable</i>	<i>Sub-TOI:</i>	<i>A02.11.002 Flexible Premium</i>
<i>Product Name:</i>	<i>FLEX5-805-X-SP, FLEX7-805-X-SP</i>		
<i>Project Name/Number:</i>	<i>FLEX 5 & 7 SCH PAGES/FLEX 5 & 7 SCH PAGES</i>		

Filing at a Glance

Company: The Variable Annuity Life Insurance Company

Product Name: FLEX5-805-X-SP, FLEX7-805-X-SP SERFF Tr Num: AGNN-126111628 State: Arkansas
X-SP

TOI: A02.11 Individual Annuities- Deferred Non- SERFF Status: Closed-Approved- State Tr Num: 42102
Variable and Variable Closed

Sub-TOI: A02.11.002 Flexible Premium Co Tr Num: FLEX5-805-X-SP State Status: Approved-Closed
Filing Type: Form Reviewer(s): Linda Bird

Author: Angie Fox

Disposition Date: 04/20/2009

Date Submitted: 04/13/2009

Disposition Status: Approved-Closed

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

General Information

Project Name: FLEX 5 & 7 SCH PAGES
Project Number: FLEX 5 & 7 SCH PAGES
Requested Filing Mode:
Explanation for Combination/Other:
Submission Type: New Submission
Overall Rate Impact:
Filing Status Changed: 04/20/2009

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Group Market Size:

Group Market Type:

Explanation for Other Group Market Type:

State Status Changed: 04/20/2009

Deemer Date:

Created By: Angie Fox

Submitted By: Angie Fox

Corresponding Filing Tracking Number:

Filing Description:

Enclosed are the above referenced forms for your review and approval. These forms are new and are intended to replace forms FLEX5-805-X-3 and FLEX7-805-X-3, previously approved by your Department.

These forms are schedule pages intended for use with forms FLEX5-805-AZ-X and FLEX7-805-AZ-X, approved by your Department on November 9, 2005. Upon approval the schedule page will be issued as part of the contract reflecting the appropriate guarantee period selected by the policyholder.

SERFF Tracking Number: AGNN-126111628 State: Arkansas

Filing Company: The Variable Annuity Life Insurance Company State Tracking Number: 42102

Company Tracking Number: FLEX5-805-X-SP

TOI: A02.11 Individual Annuities- Deferred Non- Sub-TOI: A02.11.002 Flexible Premium
Variable and Variable

Product Name: FLEX5-805-X-SP, FLEX7-805-X-SP

Project Name/Number: FLEX 5 & 7 SCH PAGES/FLEX 5 & 7 SCH PAGES

This filing does not contain any unusual or controversial items. To the best of our knowledge, information and belief, the form submitted herewith is in compliance in all respects with the provisions of the insurance laws, rules, regulations and bulletins of your State, and such form contains no provisions previously disapproved by your Department.

Company and Contact

Filing Contact Information

Angie Fox, angie.fox@aigretirement.com
2919 Allen Parkway, L10-30 713-831-6050 [Phone]
Houston, TX 77019 713-831-6932 [FAX]

Filing Company Information

The Variable Annuity Life Insurance Company CoCode: 70238 State of Domicile: Texas
2929 Allen Parkway, L10-30 Group Code: 11 Company Type:
Houston, TX 77019 Group Name: State ID Number:
(713) 831-1305 ext. [Phone] FEIN Number: 74-1625348

Filing Fees

Fee Required? Yes
Fee Amount: \$200.00
Retaliatory? Yes
Fee Explanation: The fee for making this filing in our domicile state of Texas is \$200, \$100 per form. Enclosed is \$200.00
Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
The Variable Annuity Life Insurance Company	\$200.00	04/13/2009	27140893

SERFF Tracking Number: AGNN-126111628 State: Arkansas
Filing Company: The Variable Annuity Life Insurance Company State Tracking Number: 42102
Company Tracking Number: FLEX5-805-X-SP
TOI: A02.11 Individual Annuities- Deferred Non- Sub-TOI: A02.11.002 Flexible Premium
Variable and Variable
Product Name: FLEX5-805-X-SP, FLEX7-805-X-SP
Project Name/Number: FLEX 5 & 7 SCH PAGES/FLEX 5 & 7 SCH PAGES

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	04/20/2009	04/20/2009

SERFF Tracking Number: AGNN-126111628 *State:* Arkansas
Filing Company: The Variable Annuity Life Insurance Company *State Tracking Number:* 42102
Company Tracking Number: FLEX5-805-X-SP
TOI: A02.11 Individual Annuities- Deferred Non- *Sub-TOI:* A02.11.002 Flexible Premium
Variable and Variable
Product Name: FLEX5-805-X-SP, FLEX7-805-X-SP
Project Name/Number: FLEX 5 & 7 SCH PAGES/FLEX 5 & 7 SCH PAGES

Disposition

Disposition Date: 04/20/2009

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	statement of variability		Yes
Form	Schedule Page		Yes
Form	Schedule Page		Yes

SERFF Tracking Number: AGNN-126111628 State: Arkansas

Filing Company: The Variable Annuity Life Insurance Company State Tracking Number: 42102

Company Tracking Number: FLEX5-805-X-SP

TOI: A02.11 Individual Annuities- Deferred Non- Sub-TOI: A02.11.002 Flexible Premium
Variable and Variable

Product Name: FLEX5-805-X-SP, FLEX7-805-X-SP

Project Name/Number: FLEX 5 & 7 SCH PAGES/FLEX 5 & 7 SCH PAGES

Form Schedule

Lead Form Number: FLEX5-805-X-SP

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	FLEX5-805-X-SP	Schedule Pages	Schedule Page	Initial		47.400	FLEX5-805-X-SP.pdf
	FLEX7-805-X-SP	Schedule Pages	Schedule Page	Initial		47.400	FLEX7-805-X-SP.pdf

SCHEDULE PAGE

Owner: [John Doe]_____

Joint Owner:_____

Annuitant: [John Doe]_____

Contract No.: [SPECIMEN]_____

Date of Issue: [01/02/2006]_____

Annuity Date: [01/02/2036]_____

Initial Premium: [\$10,000]_____

Interest Rates: The interest rate on the initial premium is guaranteed as follows:

[One Year Guarantee:

Base Rate: [3.50 %]

Enhancement Rate:..... [2.25 %]

Enhancement Rate for initial premiums of \$100,000 or more: [1.00%]

One Year Rate:..... [6.75%]

[Three Year Guarantee:

Base Rate: [3.15 %]

Enhancement Rate:..... [.70 %]

Enhancement Rate for initial premiums of \$100,000 or more: [.30%]

Three Year Rate:..... [4.15%]

[Five Year Guarantee:

Five Year Rate: [3.30%]

The minimum guaranteed interest rate for the life of your policy is [2.00%].

SCHEDULE PAGE

Owner: [John Doe]_____

Joint Owner:_____

Annuitant: [John Doe]_____

Contract No.: [SPECIMEN]_____

Date of Issue: [01/02/2006]_____

Annuity Date: [01/02/2036]_____

Initial Premium: [\$10,000]_____

Interest Rates: The interest rate on the initial premium is guaranteed as follows:

[One Year Guarantee:

Base Rate: [3.50 %]

Enhancement Rate:..... [2.25 %]

Enhancement Rate for initial premiums of \$100,000 or more: [1.00%]

One Year Rate:..... [6.75%]

[Three Year Guarantee:

Base Rate: [3.15 %]

Enhancement Rate:..... [.70 %]

Enhancement Rate for initial premiums of \$100,000 or more: [.30%]

Three Year Rate:..... [4.15%]

[Five Year Guarantee:

Five Year Rate: [3.30%]

[Seven Year Guarantee:

Seven Year Rate:..... [3.60%]

The minimum guaranteed interest rate for the life of your policy is [2.00%].

<i>SERFF Tracking Number:</i>	<i>AGNN-126111628</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>The Variable Annuity Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>42102</i>
<i>Company Tracking Number:</i>	<i>FLEX5-805-X-SP</i>		
<i>TOI:</i>	<i>A02.11 Individual Annuities- Deferred Non-</i>	<i>Sub-TOI:</i>	<i>A02.11.002 Flexible Premium</i>
	<i>Variable and Variable</i>		
<i>Product Name:</i>	<i>FLEX5-805-X-SP, FLEX7-805-X-SP</i>		
<i>Project Name/Number:</i>	<i>FLEX 5 & 7 SCH PAGES/FLEX 5 & 7 SCH PAGES</i>		

Supporting Document Schedules

	Item Status:	Status Date:
Satisfied - Item: Flesch Certification Comments: Attachment: AR-flesch.pdf		
Bypassed - Item: Application Bypass Reason: n/a Comments:	Item Status:	Status Date:
Bypassed - Item: Life & Annuity - Acturial Memo Bypass Reason: n/a Comments:	Item Status:	Status Date:
Satisfied - Item: statement of variability Comments: Attachment: SOV-FLEX5-805-X-SP.pdf	Item Status:	Status Date:

CERTIFICATION

THE VARIABLE ANNUITY LIFE INSURANCE COMPANY, NAIC #70238, hereby certifies that the following form(s) comply with the Flesch scale of readability requirements of Ark. Stat. Ann. s 23-80-206 and s 23-80-207 as cited in the Life and Disability Insurance Policy Language Simplification Act.

<u>Form Number</u>	<u>Form Description</u>	<u>Flesh Score</u>
FLEX5-805-X-SP	Schedule Page	47.4
FLEX7-805-X-SP	Schedule Page	47.4

Angie Fox

Angie Fox, ACS, AIAA, AIRC
Legal Analyst II

April 13, 2009

Date

**Statement of Variability for Forms:
FLEX5-805-X-SP and FLEX7-805-X-SP**

Effective Date: April 6, 2009

- The guaranteed minimum interest rate in the above captioned form is submitted on a variable basis. The minimum guaranteed interest rate is denoted as variable by the use of brackets []. The rate will range between 1.0% to 3.0% and is tied to the five-year Constant Maturity Treasury Rate. Any changes will be applicable only to new issues.

Variable Material specific to FLEX5-805-X-SP

- The current interest rate on the FLEX5-805-X-SP product for the 1, 3, and 5 year guarantee periods are 6.60%, 4.15%, and 3.30%, respectively. The current rate will vary according to economic conditions between 1.00% and 10.00%. The duration of the guarantee periods will also depend on market conditions and will range between one and seven years. Any changes will be applicable only to new issues.
- The 1 and 3 year interest rate guarantee periods will include an Interest Rate Enhancement applicable to the initial premium payment. The Interest Rate Enhancement will vary according to economic conditions between .20% and 10.00%. Additionally, initial premium payments of \$100,000 or greater will receive an additional Interest Rate Enhancement payable. This Interest Rate Enhancement may vary from time to time, between .05% and 5.00%. The Interest Rate Enhancement is shown on the Schedule Page and is denoted with brackets.

Variable Material specific to FLEX7-805-X-SP

- The current interest rate on the FLEX7-805-X-SP product for the 1, 3, and 7 year guarantee periods are 7.20%, 4.95%, and 3.60%, respectively. The current rate will vary according to economic conditions between 1.00% and 10.00%. The duration of the guarantee periods will also depend on market conditions and will range between one and seven years. We are filing this schedule page with a five year guarantee period although we currently do not intend to actively sell this option. We are filing for approval now so that we may add this option without re-filing the form. Any changes will be applicable only to new issues.
- The 1 and 3 year interest rate guarantee periods will include an Interest Rate Enhancement applicable to the initial premium payment. The Interest Rate Enhancement will vary according to economic conditions between .20% and 10.00%. Additionally, initial premium payments of \$100,000 or greater will receive an additional Interest Rate Enhancement payable. This Interest Rate Enhancement may vary from time to time, between .05% and 5.00%. The Interest Rate Enhancement is shown on the Schedule Page and is denoted with brackets.



Tracey Harris - Vice President
The Variable Annuity Life Insurance Company

Date April 6, 2009